



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

July 11, 2023

BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, NY 10007

Re: Brennan Center for Justice v. United States, No. 22 Civ. 7038 (CM)

Dear Judge McMahon:

This Office represents the defendants, the United States Department of Homeland Security ("DHS") and United States Immigration and Customs Enforcement ("ICE," and with DHS, "Defendants"), in the above-referenced FOIA action brought by plaintiff Brennan Center for Justice at the New York University School of Law ("Plaintiff"). I write respectfully on behalf of the parties to provide a status update.

Since the last status update, ICE has continued to review potentially responsive records, and it made an additional production of non-exempt, responsive records on June 30. At present, ICE is processing the records at a rate of at least 500 pages per month and will continue to make productions of non-exempt, responsive records on a monthly basis until completed. In addition, as previously anticipated, DHS produced the non-exempt, responsive records resulting from a separate search on June 30.

The parties continue to believe that it may ultimately be possible to resolve this matter without the need for judicial intervention. Accordingly, the parties respectfully request that the Court permit the parties to submit a further status report on August 18, 2023, advising the Court of the parties' progress on this matter.

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We thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: All counsel of record (via ECF)